

**COMMON QUESTIONS AND ANSWERS  
ON DESIGNATION OF CERTIFIED APPLICATION COUNSELOR (CAC)  
ORGANIZATIONS IN FEDERALLY-FACILITATED MARKETPLACES**

1. **The preamble to the final rule and CMS' guidance says that the Federally-facilitated Marketplaces will designate certain types of organizations as CACs. Some types of organizations, by the nature of the organization, will clearly meet the criteria to be a CAC, such as HRSA grantees, FQHCs, and IHS.**

**Do those organizations have to file an application in order to be designated as a CAC organization?**

**ANSWER:** Yes. Although we anticipate designating all interested HRSA grantees, FQHCs, IHS, and similar organizations as CAC organizations, they must submit an application for us to designate them.

2. **May an organization be both a Navigator or a Champion for Coverage, and also be a designated CAC organization?**

**ANSWER:** Yes, an organization may be a Navigator grantee or a Champion for Coverage and also be a designated CAC. However, we do not anticipate that any Navigator grantees will seek to become a designated CAC organization for the same service area as well. Navigator grantees are funded to perform the type of work that designated CAC organizations may perform plus additional types of work, such as outreach and education.

3. **If an organization has multiple locations, facilities and/or organizational members, may the larger (for example, the parent) organization apply to be a designated CAC organization on behalf of all of its facilities, locations, etc.? Or must each location or organizational member or subsidiary submit a separate application?**

**ANSWER:** In a Federally-facilitated Marketplace, each separate legal component of a larger organization must submit its own application to be a designated CAC organization. However, a single legal entity with multiple locations within a single state may submit the application for all of its locations. If an entity has locations in several different states in which a Federally-facilitated Marketplace will be operating, it must submit a separate application for each state.

An organization submitting an application for multiple locations should keep in mind that the organization that submits the application is responsible for making sure that all of the staff and volunteers it certifies as individual certified application counselors take and pass the training, and comply with the requirements to be a CAC including privacy and security requirements. Also, the organization that submits the application is responsible for making sure that each staff member and volunteer it certifies as a certified application counselor signs an agreement that he/she will comply with the CAC requirements.

Organizations seeking to become CAC organizations in State-based Marketplaces should contact the State-based Marketplace to learn more about the applicable procedures.

4. **The CAC application for Federally-facilitated Marketplaces only allows us to include 5 locations. How do we include more than 5 locations?**

**ANSWER:** If the organization submitting the CAC application has more than 5 locations, it should submit a separate application per every 5 locations. If the organization has more than 25 locations, please indicate that in one of the boxes indicating location, and if the organization becomes a designated CAC organization, CMS will contact it to obtain the information for the additional locations.

5. **The CAC application for Federally-facilitated Marketplaces asks the organization to list locations following the question “How can the general public contact your organization”. Is the organization supposed to list every location where it has offices?**

**ANSWER:** The organization should list all locations where it will provide certified application counseling services to consumers. It should not list any offices or facilities where it does not intend to provide certified application counselor services.

6. **If my organization wants to provide CAC services in a state in which there is a Federally-facilitated Marketplace (FFM), I understand that the CAC training will be given on-line by the FFM. If my organization is in a state in which there is a State-based Marketplace (SBM), how do I know what training will be required and how to access that training?**

**ANSWER:** All SBMs are required to have and train CACs. Each SBM is responsible for deciding what training it will require for CACs in its state and how it will conduct that training. SBMs may choose to use the FFM CAC training, or they may choose to provide their own CAC training. This is true for organization seeking to offer CAC services in a state with a SBM, including organizations that receive federal funding, such as HRSA grantees and FQHCs.

Organizations in states with a SBM should contact the SBM or go to the SBM’s website for information about the CAC program in that state. For links to each SBM’s website, see <http://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/state-marketplaces.html> .

7. **The preamble to the final rule and the guidance CMS issued indicate that organizations the FFM may designate as CAC organizations include agencies that have experience providing social services to the community, such as SNAP outreach, energy assistance, or tax assistance, that are non-federal governmental organizations or are organized under section 501(c) of the Internal Revenue Code.**

**Our organization receives federal funds. Does that disqualify it from being a designated CAC organization?**

**ANSWER:** No. An organization that receives federal funds may apply to become a designated CAC organization as long as its participation in the CAC program would not otherwise be prohibited.